



U.S. Department of Justice

*United States Attorney
Eastern District of New York*

F. #2016R02185

*271 Cadman Plaza East
Brooklyn, New York 11201*

October 16, 2018

By FedEx and ECF

Garnett H. Sullivan
1080 Grand Avenue, Suite 200
South Hempstead, New York 11550

Re: United States v. Donville Inniss
Criminal Docket No. 18-134 (S-1)(KAM)

Dear Mr. Sullivan:

Pursuant to Rule 16 of the Federal Rules of Criminal Procedure, the government hereby furnishes the following additional discovery with respect to the above-referenced matter. This submission supplements the government's earlier disclosure of August 23, 2018. With this production, the government renews its request for reciprocal discovery from the defendant.

Enclosed with this letter are two discs that contain the following:¹

- The redacted affidavits and search warrant and supplemental search warrant relating to the search of the defendant's email account, Bates-numbered DOJ-CDL-00051207 – 00051251. Additional resulting emails are forthcoming.²
- Bank of America records relating to the defendant and the New York Dental Company, Bates-numbered DOJ-CDL-00046653 – 00046656 and DOJ-CDL-00047712 – 00048849.
- First National Bank of Long Island records relating to the New York Dental Company, Bates-numbered DOJ-CDL-00046656; DOJ-CDL-00046661 – 00047052 and DOJ-CDL-00050415 – 00051188.

¹ Pursuant to the August 23, 2018 Court order and signed by counsel, the defendant and the government, you are required to safeguard any personally identifying information that has not been redacted.

² Under separate cover, at a later date, a Department of Justice filter attorney will send a complete set of emails obtained from the search warrant and supplemental search warrant.

- Signature Bank records relating to the defendant, Bates-numbered DOJ-CDL-00047056 – 00047711.
- JP Morgan Chase records relating to the defendant and a co-conspirator, Bates-numbered DOJ-CDL-00048850 – 00049524.
- Wells Fargo records relating to the defendant, Bates-numbered DOJ-CDL-00049525 – 00049533; DOJ-CDL-00049542 – 00049563 and DOJ-CDL-00049565 – 00049630.
- Records relating to Insurance Corporation of Barbados Ltd., Bates-numbered DOJ-CDL-00049639 – 00050297.
- The defendant's 2015 tax returns, Bates-numbered DOJ-CDL-00051189 – 00051206.

Per Federal Rules of Evidence 803(6) and 902(11), where affidavits concerning the authenticity of the records are included herein for business records, the government intends to proffer those records into evidence at trial as self-authenticating. See United States v. Komasa, 767 F.3d 151 (2d Cir. 2014).

If you have any questions or requests regarding further discovery or a disposition of this matter, please do not hesitate to contact us.

Very truly yours,

RICHARD P. DONOGHUE
United States Attorney

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Enclosures

cc: Clerk of the Court (KAM) (by ECF) (without enclosures)